

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
*Alexandria Division***

PATRICIA BURKE,

Plaintiff,

v.

JAMES MATTIS, THE SECRETARY OF DEFENSE

Defendant.

1:16-cv-1256 LO/JFA

PLAINTIFF'S MOTION FOR INJUNCTIVE RELIEF

Pursuant to 42 U.S.C. § 2000e-5(g), Plaintiff Patricia Burke, by counsel, respectfully moves for injunctive relief. The grounds for this motion are set forth in a memorandum of law simultaneously filed. Ms. Burke respectfully requests the following relief:

1. An order compelling DSS to reorganize its management structure, such that the EEO Director will report directly to the DSS's agency head, as required by federal regulation;
2. An order prohibiting DSS and any and all agents from interfering with EEO Staff related to employee EEO complaints;
3. An order requiring William Stephens, Franklin Malafarina, Michael Buckley and all other managers within the Counterintelligence Directorate (CI) to take additional EEO training;
4. An order directing DSS to formulate a Retaliation Prevention Plan to prevent retaliation against any DSS employees that make or maintain EEO complaints and to submit that plan to the Court for approval;
5. An order directing DSS to submit to the Court proposed personnel realignments that permanently separate Ms. Burke from harassers William Stephens, Franklin Malafarina, and

Michael Buckley, while preserving Ms. Burke's pay grade and rate and ensuring that she has work commensurate with her skills and pay grade;

6. An order prohibiting DSS or any and all agents of DSS from retaliating against Ms. Burke for making and prosecuting her EEO complaints; and

7. Such other relief as may be just and proper.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of such filing to the following attorneys of record:

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